

UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

DAVID J. GARSIA, Plaintiff, Pro Se

v.

WILLIAM "BILLY" PROCIDA; DEREK WEISSMAN; SILLS CUMMIS & GROSS P.C.; MICHAEL R. LEIGHTON; 100 MILE FUND LLC; 100 MILE REIT INC.; 100 MILE RENARD TOTOWA LLC; SPRUCE STREET PARTNERS LLC; STEVEN D. PLOFKER; BOBBI BROWN PLOFKER; DINO TOMASSETTI; RON SIMONCINI; ERIC R. PERKINS; SHARI HARTSTEIN; HARRY BYRNES; ERNEST RUCKER; NAI JAMES E. HANSON; PATRICIA A. STAiano; JOHN O'BOYLE; CHARLES FLORIO; ANDREW KOVAR; MARIO PROCIDA; PETER PROCIDA; 468 TOTOWA OWNER, LLC

JOHN DOES 1–10 – "Procida Entity Investors" JANE DOES 11–20 – "Professional Enablers" JOHN DOES 21–30 – "Shill Entity Operators" JANE DOES 31–40 – "Retaliatory Agents" JOHN DOES 41–50 – "Political and Public Sector Enablers" JANE DOES 51–60 – "Community Organization Co-Conspirators"

Defendants.

Civil Action No. \_\_\_\_\_

FEDERAL PLACEHOLDER COMPLAINT TO TOLL RICO, FRAUDULENT TRANSFER, AND CIVIL RIGHTS CLAIMS JURY TRIAL DEMANDED

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## 1. INTRODUCTION

This placeholder complaint is filed to preserve Plaintiff's rights under the Racketeer Influenced and Corrupt Organizations Act (RICO), the U.S. Bankruptcy Code, the New Jersey Uniform Fraudulent Transfer Act, and civil rights laws.

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## 2. NATURE OF THE ACTION

This action arises under:

- 18 U.S.C. §§ 1961–1968 (RICO)
- 11 U.S.C. §§ 544, 548 (Bankruptcy Fraudulent Transfers)
- N.J.S.A. 25:2-20 et seq. (NJ Uniform Fraudulent Transfer Act)
- 42 U.S.C. § 1983 (Civil Rights Violations)

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### **3. JURISDICTION AND VENUE**

**Jurisdiction is proper under 28 U.S.C. § 1331 (Federal Question), 18 U.S.C. § 1964(c) (RICO), and 42 U.S.C. § 1983 (Civil Rights).**

**Venue is proper under 28 U.S.C. § 1391 as the acts occurred in this District.**

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### **4. PARTIES**

**A complete list of named defendants, their roles, and addresses for service is attached as Exhibit A.**

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#### **UNKNOWN BUT LIABLE DEFENDANTS**

- 5. JOHN DOES 1–10 – "Procida Entity Investors": Unknown investors in Procida-controlled entities who financed the fraudulent scheme.**
- 6. JANE DOES 11–20 – "Professional Enablers": Lawyers, brokers, and accountants who knowingly facilitated the transfers and suppressions.**
- 7. JOHN DOES 21–30 – "Shill Entity Operators": Nominee members or LLC agents who enabled title fraud and laundering.**
- 8. JANE DOES 31–40 – "Retaliatory Agents": Court officers and individuals who looted, surveilled, or threatened the Garsia family.**
- 9. JOHN DOES 41–50 – "Political and Public Sector Enablers": Officials and government agents who facilitated the fraudulent scheme or suppressed investigation.**
- 10. JANE DOES 51–60 – "Community Organization Co-Conspirators": Nonprofit leaders and board members who supported the hostile takeover.**

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### **11. FACTUAL OVERVIEW**

**Plaintiff incorporates by reference the Whistleblower Complaint submitted to the U.S. Trustee on June 21, 2025, attached as Exhibit B.**

**Key facts include:**

- A loan-to-own scheme seizing high-value properties via coercion and fraud.**
- The use of fraudulent transfers and LLCs to obscure ownership.**

- Court-assisted suppression of speech, looting of residence, and violations of due process.

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## 12. DAMAGES

- Real Estate Losses: \$25,000,000+
- Business, Brand, and Equity Loss: \$5,000,000+
- Harm to Wedding Clients and Contractors: \$3,310,734.36
- Treble Damages under RICO: TBD
- Civil Rights and IRS Claims: Pending

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## 13. PRESERVATION OF CLAIMS

This Complaint is filed to toll:

- RICO statute of limitations
- Fraudulent transfer limitations (Federal and NJ state law)
- Civil rights claims under federal law

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## 14. PLACEHOLDER STATUS

Plaintiff intends to file an amended complaint within 60–90 days including:

- Full factual details per defendant
- Predicate acts and civil rights theories
- Evidentiary exhibits and documentation

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## PRAYER FOR RELIEF

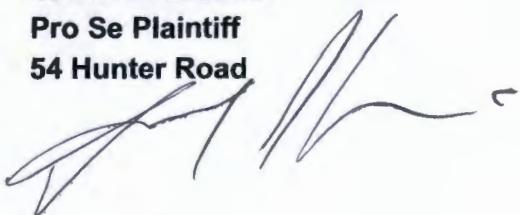
WHEREFORE, Plaintiff respectfully requests: A. That this Complaint toll all applicable statutes; B. Leave to amend the Complaint within 60–90 days; C. Preservation of all rights and remedies under law; D. Such other relief as the Court deems just and proper.

Respectfully submitted,

DAVID J. GARSIA

Pro Se Plaintiff

54 Hunter Road



**North Haledon, NJ 07508**  
**create.artfactory@gmail.com**  
**(201) 254-4840**  
**Dated: June 23, 2025**

A handwritten signature in black ink, appearing to read "J. H. L." or a similar variation, is positioned below the typed address.